

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

JAMES RYALS, JR.,
on behalf of himself and others
similarly situated,

Plaintiff,

v.

Civil Action No. 3:14-cv-00643-REP

STRATEGIC SCREENING SOLUTIONS, INC.,
And LIBERTY SCREENING SOLUTIONS, LTD.,

Defendants.

**PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS
SETTLEMENT, CONDITIONALLY CERTIFYING CLASSES FOR PURPOSES OF
SETTLEMENT, APPOINTING CLASS COUNSEL, DIRECTING NOTICE TO THE
CLASS, AND SCHEDULING FINAL FAIRNESS HEARING**

Plaintiff, James Ryals, Jr., with the consent of Defendants, Strategic Screening Solutions, Inc. and Liberty Screening Solutions, Ltd., entered into a Settlement Agreement attached hereto as Exhibit "1". Pursuant to Fed. R. Civ. P. 23, the Parties hereby move the Court for Preliminary Approval of the Class Action Settlement Agreement. For the reasons supplied in the accompanying Memorandum in Support, the Parties respectfully request that the Court enter a Preliminary Approval Order, in the proposed form attached hereto as Exhibit "1-A":

- (1) Preliminarily approving a proposed class settlement;
- (2) Scheduling a fairness hearing;
- (3) Certifying the proposed settlement class for purposes of the proposed class settlement;
- (4) Appointing class counsel, and
- (5) Approving the form and manner of notice proposed to be sent to all members of the

settlement class.

Respectfully Submitted,

JAMES A. RYALS,
on behalf of himself and others
similarly situated,

BY: /s/
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Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December, 2015, I filed a true and correct copy of the foregoing on the Court's CM/ECF System, which will send a notice of electronic filing to all counsel of record, including:

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